

**Federal Defenders  
OF NEW YORK, INC.**

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September 15, 2020

**Via ECF**

Honorable Naomi Reice Buchwald  
United States District Judge  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

**Re: United States v. Nancy Martino-Jean,  
18 CR. 853 (NRB)**

Dear Judge Buchwald:


I write to respectfully request that Your Honor permit Ms. Nancy Martino-Jean to take humanitarian trips outside of the United States—with prior approval from the U.S. Department of Probation—at any point during the remainder of her period of supervised release. Her Probation Officer in the Southern District of Florida, Robert Tango, consents to this request.

On October 17, 2019, Ms. Martino-Jean received a sentence of time served with two years of supervised release. Since 2016, she has partnered with the Ferris State University Haiti Study Abroad program to help build homes for Haitians living in poverty. Her next trip is scheduled for late October 2020. With the Court's permission, Ms. Martino-Jean would be able to take this and other similar humanitarian trips—with the prior approval of her Probation Officer—during the remainder of her period of supervised release.

Respectfully submitted,

/s/ Amy Gallicchio  
Amy Gallicchio  
Assistant Federal Defender  
(212) 417-8728

**SO ORDERED:**

  
**HONORABLE NAOMI REICE BUCHWALD**  
**United States District Judge**

Dated: New York, New York  
September 16, 2020